UNITED STATES DISTRICT COURT

for the
Eastern District of Wisconsin

In the Matter of the Search of:

Information associated with Facebook user ID 100012981973745 that is stored at premises owned, maintained, controlled, or operated by Facebook

Case No. 16-M-1343

APPLICATION FOR A SEARCH WARRANT

I, Special Agent Jeffrey Ferris, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property:

See Attachment A.

there is now concealed:

See Attachment B.

The basis for the search under Fed. R. Crim P. 41(c) is:

- ☒ evidence of a crime;
- ☐ contraband, fruits of crime, or other items illegally possessed;
- ☐ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to violations of: 18 U.S.C. §§ 401(3), 1029, 1343 and 3146.

The application is based on these facts: See attached affidavit.

☐ Delayed notice of _______ days (give exact ending date if more than 30 days: _______________) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

____
Applicant's signature

Special Agent Jeffrey Ferris, United States Secret Service
Printed Name and Title

Sworn to before me and signed in my presence:

Date: 12/13/16

____
Judge's signature

City and State: Milwaukee, Wisconsin

Hon. William E. Duffin, U.S. Magistrate Judge
Printed Name and Title

AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR A SEARCH WARRANT

I, Jeffrey Ferris, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I make this affidavit in support of an application for a search warrant for information associated with certain Facebook user IDs that are stored at premises owned, maintained, controlled, or operated by Facebook, a social networking company headquartered in Menlo Park, California. The information to be searched is described in the following paragraphs and in Attachment A. This affidavit is made in support of an application for a search warrant under 18 U.S.C. §§ 2703(a), 2703(b)(1)(A) and 2703(c)(1)(A) to require Facebook to disclose to the government records and other information in its possession, pertaining to the subscriber or customer associated with the user IDs. The Target Facebook numbers are described herein and in Attachment A, and the location information to be seized is described herein and in Attachment B.

2. I am a Special Agent with the United States Secret Service ("Secret Service"), and have been so employed since 2011. I am currently assigned to the Milwaukee Resident Office. My duties as a Special Agent with the Secret Service include investigating financial crimes such as identity fraud, check fraud, credit card fraud, bank fraud, wire fraud, currency-counterfeiting offenses, and money laundering. My duties as a Special Agent with the Secret Service also include continued investigations into ongoing cases, including those that are in judicial action. This includes conduct by defendants that is contrary to court imposed conditions of release which are related to the investigations matter at hand. I have experience investigating complex financial crimes with an international aspect, which includes knowledge that international co-conspirators often use money service businesses such as MoneyGram or Western Union. I have

training and experience in the manner which criminals transact victims' credit and debit card accounts through "carding" websites online. I have gained experience in the conduct of such investigations through previous case investigations, formal training, and in consultation with law enforcement partners in local, state and federal law enforcement agencies.

3. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other law enforcement officers and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

4. Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe that Ashley Dover has committed contempt of court, by disobeying a lawful order of a court of the United States, in violation of 18 U.S.C. § 401(3), failure to appear to a court ordered hearing, in violation of 18 U.S.C. § 3146, wire fraud, in violation of 18 U.S.C. § 1343, and access device fraud, in violation of 18 U.S.C. § 1029. There is also probable cause to search the information described in Attachment A for evidence of these crime as described in Attachment B.

5. In summary, while on pre-trial release, Ashley Dover communicated extensively with others on her Facebook account contrary to a condition of her release. She also resumed her fraudulent activity with others. When the United States sought to revoke her bond, Ashley Dover did not appear in court, but rather, as she put it in a letter, decided to "take my chances running." After she failed to appear, Ashley Dover ceased accessing her known Facebook account of which she learned the United States was aware. Nevertheless, her Facebook account revealed individuals with whom she was in frequent contact prior to becoming a fugitive, many

of which she discussed her financial transactions. Search warrant results revealed that some of these individuals were attempting to contact Ashley Dover through their Facebook accounts.

6. One of those individuals with whom Dover was in contact via Facebook was Portia Lamb. Shortly after Dover failed to appear in federal court, and became a fugitive, Portia Lamb "befriended" on Facebook an account that used the name "Rudy Jenkins." Facebook messages then ensued between Lamb and the account that used the name "Rudy Jenkins." These messages were consistent to the dialogue and use of an external perishable private messaging service that was used between Ashley Dover and Portia Lamb before Dover fled.

7. Furthermore, "Rudy Jenkins" is Facebook friends with Omeshia Crusoe, of Chicago, Illinois and Courtney Nash, of Jackson, Mississippi, all whom are not Facebook friends with each other. The only known associate with whom they have in common is Ashley Dover.

8. In September 2016, during the time that the "Rudy Jenkins" account was being used and Dover was a fugitive, Dover sent her father a post card in which she referred to herself as "Rudy."

9. The "Rudy Jenkins" Facebook account is also "friends" with international persons from countries such as Algeria, Kenya, Cote d'Ivoire, Spain, United Kingdom and persons whose names are written in Arabic but don't identify where their home country is.

10. I believe there is probable cause to believe the "Rudy Jenkins" Facebook account will have evidence of "Rudy Jenkins" financial transactions pertaining to Ashley Dover and likely identify "Rudy Jenkins" Facebook account is a disguised account of Ashley Dover.

11. Probable cause that evidence of this kind is likely in this individual's Facebook account is based and all of the evidence outlined in the following paragraphs.

PROBABLE CAUSE

12. Ashley Dover is a federal defendant who was released on pre-trial bond on or about December 4, 2015. She signed a plea agreement and was scheduled to be sentenced on September 28, 2016, by Judge Charles N. Clevert, United States District Judge for the Eastern District of Wisconsin.

I. Underlying Charges and Investigation of Ashley Dover

13. On October 22, 2014, the federal grand jury in the Eastern District of Wisconsin returned a 33-count indictment against 10 defendants (US v. Dover, et al., case number 14-CR-196) (hereinafter referred to as the "Indictment."). Specifically, the Indictment charged Ashley Dover with one count of conspiracy to commit access device fraud, in violation of 18 U.S.C. § 1029(b)(2), and six counts of aggravated identity theft, in violation of 18 U.S.C. § 1028A.

14. According to Count One of the Indictment, the conspiracy to commit access device fraud occurred from August 21, 2009, through the date of the Indictment. It consisted of co-conspirators using stolen credit card information primarily to purchase tickets to sporting and entertainment events throughout the United States.

15. Count One of the Indictment also alleged that from on or about August 21, 2009, through approximately March 2012, Ashley Dover distributed over 3800 stolen credit card numbers to others. The credit card account numbers that Ashley Dover distributed were used by the defendants and others to conduct over $1.7 million in fraudulent transactions. In March 2012, Ashley Dover was arrested and eventually imprisoned pursuant to State of Mississippi and federal charges in the Southern District of Mississippi pertaining to credit card fraud unrelated to the charges in the Indictment in the Eastern District of Wisconsin.

16. As part of the investigation of Ashley Dover's role in the conspiracy charged in Count One of the Indictment, investigators reviewed a computer hard drive that belonged to Ashley Dover through the time of her arrest in Mississippi in March 2012. The computer hard drive uncovered the content of several hundred thousand chat logs.

17. Amongst other matters, in her chat logs, she referred to herself as "Ashley," admitted she was addicted to "carding," and explained that she was living a "double life" as a carder and a college student. She also wrote that her cousin, Olivia Ray, knows about her carding activity, and Ashley Dover gave Ray's address in Chicago as a "drop address." Based on my training and experience, a "drop address" means that is where Ashley Dover would have someone pick up the fraudulently obtained identifying and/or financial information that Ashley Dover may have agreed to sell to someone.

18. In her chat logs, she also had conversations with unknown individuals about the need to set up foreign bank accounts. Another unknown individual offered to open a foreign bank account for her in Lebanon.

19. In addition to reviewing Ashley Dover's chat logs, investigators also obtained a state search warrant for her email accounts, which from at least 2009 through 2012, included accounts entitled: freedomalexander@hotmail.com and freedomalexander@yahoo.com.

20. In her freedomalexander@hotmail.com account, on November 20, 2009, and January 22, 2010, she received Amtrak reservation confirmations under the name "Ashley Dover." In another email on August 21, 2009, the author of an email sent from freedomalexander@hotmail.com identified herself as Ashley Dover.

21. Investigators found in the freedomalexander@hotmail.com account an e-mail conversation that occurred on April 4, 2010, between freedomalexander@hotmail.com and

john.linx@hotmail.com. The unknown individual writing from john.linx@hotmail.com expressed interest in purchasing "Canadian dumps," which based on my training and experience, related to fraudulently obtained identifying and/or financial information of individuals from Canada. During this email conversation, "john.linx" asked for Western Union information. The author of an email originating from freedomalexander@hotmail.com responded with an email giving her "drop details" of a name of an individual she identified as being in Vietnam. "John.linx" replied by stating, ". . . and I thought u were russian." The response from the freedomalexander@hotmail.com was: "No, I am not russian, I'm from the usa. I am using one of my partners as a drop but as I receive verification that the money has been sent I will immediately send you an email with dump info." Later in the email string, freedomalexander@hotmail.com wrote: "My drop info changes every month so you will have to let me know when you have sent or if you still want the dumps."

II. Ashley Dover's Bond Hearing and Conditions of Release

22. On or about March 27, 2012, Ashley Dover was arrested and eventually charged with unrelated credit card fraud activity by both the State of Mississippi and by a federal grand jury in the Southern District of Mississippi. Ashley Dover pled guilty to both state and federal charges in Mississippi. On October 21, 2012, she was sentenced to 24 months by the federal district court for the Southern District of Mississippi for aggravated identity theft. On February 11, 2013, the State of Mississippi sentenced her to a term of imprisonment for credit card fraud and identity theft. She was released from state custody on or about December 4, 2015. Prior to her release, on December 1, 2015, United States Magistrate Judge Nancy Joseph, of the Eastern District of Wisconsin, held a bond hearing to determine Ashley Dover's release status pending the litigation of the charges contained in the Indictment in the Eastern District of Wisconsin.

23. At the bond hearing held on December 1, 2015, the United States requested that Ashley Dover be detained, and in support, provided some of the details of the investigation, including how Ashley Dover used Western Union and the internet as instruments of her fraud, as well as details of her chat logs relating to potential foreign contacts. Judge Joseph ordered Ashley Dover released with conditions to address those concerns. Her release was to commence at the conclusion of Ashley Dover's state custody on December 4, 2015.

24. Of note, Judge Joseph ordered Ashley Dover, as a condition of her release, to not use the internet. Judge Joseph also ordered Ashley Dover to not use any credit cards or checks, and have no employment with access to financial and credit card information. Ashley Dover acknowledged the order of her release with her written signature.

25. On June 8, 2016, Ashley Dover entered a plea of guilty to Counts One and Fifteen of the Indictment before United States District Judge Charles N. Clevert. Count One charged Ashley Dover with conspiracy to commit access device fraud, in violation of 18 U.S.C. § 1029(b)(2), and Count Fifteen charged her with aggravated identity theft, in violation of 18 U.S.C. § 1028A. Judge Clevert scheduled her to be sentenced on September 28, 2016.

26. According to the terms of the plea agreement, Ashley Dover acknowledged that if she "engages in any further criminal activity prior to sentencing . . . this agreement shall become null and void at the discretion of the government." It further provides, "If this plea agreement is revoked or if the defendant's conviction ultimately is overturned, then the government retains the right to file any and all charges which were not filed because of this agreement."

III. Ashley Dover's International Financial Transactions after Her Release on Bond

27. My investigation of Ashley Dover has revealed probable cause to believe that, since her release on bond on December 4, 2015, she has engaged in international financial

transactions via MoneyGram and Western Union. She has also been active on the internet. Through the use of MoneyGram, Western Union, or the internet, Ashley Dover transacted with acquaintances violating her release restrictions.

28. On June 30, 2016, and July 13, 2016, I received information from MoneyGram regarding transactions conducted by Ashley Dover for the preceding six months. On June 24, 2016, at 2:47 P.M., Ashley Dover picked up $490.00 from MoneyGram inside of Wal-Mart, 8331 S. Stewart Ave. Chicago, Illinois, 60620, which was sent by Otar Zalikashvili, of Nucubidzis 74, Tbilisi, in the country of Georgia. Ashley Dover identified herself during the $490.00 pickup to MoneyGram using an Illinois identification card bearing number 16000190667D, address 63 East 144th Street, Riverdale, Illinois 60620.

29. On March 3 and 5, 2016, Ashley Dover sent a total of $585.00 to Judith Williams. Judith Williams used her Michigan license bearing W452454572169, to pick up the $585.00 from two currency exchanges in the Detroit, Michigan area.

30. On June 14, 2016, Courtney Nash sent Ashley Dover $675.00 from MoneyGram inside the Wal-Mart at 2711 Greenway Drive, Jackson, Mississippi. The $675.00 was picked up at a currency exchange located at 7859 S. Cottage Grove Avenue, Chicago, Illinois, which is within three miles of Ashley Dover's residence of 650 West 87th Street, Chicago, Illinois.

31. An inquiry with the State of Illinois confirmed Ashley Dover has a driver's license/identification card bearing number 16000190667D with a photograph bearing her resemblance.

32. On July 20, 2016, I received information from Western Union regarding transactions, to include international transactions Ashley Dover conducted since December 1, 2015.

33. According to information I received from Western Union, on March 17, 2016, someone identifying herself as Ashley Dover sent $300.00 from a Western Union location, 808 W. 87th St. Chicago, IL 60620 Chicago, Illinois, to Mingde Zhou in Shnzhenshi, China. When Ashley Dover sent the money, she identified herself by name and address, 650 W. 87th St, Chicago, IL 60620, which is within a mile from her home.

34. On April 19, 2016, and on April 23, 2016, two days prior to Ashley Dover's proffer interview with the Government, she received two Western Union payments in the amounts of $299.00 and $200.00 from "John Hall," who provided a phone number of 917-224-4945. "John Hall" sent these monies from a Western Union location in Queens, New York. A law enforcement search through TLO.com revealed 917-224-4945 was issued to "Shakira Taylor." "Shakira Taylor" is known to the original investigation as the girlfriend of "GucciCity," the moniker name of a person Ashley Dover communicated with on an open source instant messaging computer program called "ICQ," to converse about credit card fraud and identity theft. During the April 25, 2016 proffer interview with Ashley Dover, she admitted to previously dealing with "GucciCity" in the original investigation, however failed to bring up any recent dealings with "GucciCity" or any of "GucciCity's" associates.

35. According to information I received from Western Union, on June 26, 2016, Ashley Dover received $50.00 from Elizabeth Baluran, who sent the funds from a location in Davao, Philippines. When Ashley Dover picked up the money at Western Union located at 353 W. 79th St, Chicago, IL 60620, she identified herself by name and address. This Western Union location is within a mile from her father's home where she was previously residing.

36. On July 28, 2016, I received information from Wal-Mart regarding the June 24, 2016 MoneyGram transaction inside of Wal-Mart, 8331 S. Stewart Ave. Chicago, Illinois,

60620. Wal-Mart provided surveillance still photographs and video surveillance of the person who picked up the $490.00 from MoneyGram on June 24, 2016 at 2:47 P.M. The surveillance stills and video showed Ashley Dover making the transaction.

IV. Ashley Dover's Misdemeanor Arrest in Roseville, Michigan

37. On August 4, 2016, Ashley Dover was arrested by the Roseville, Michigan Police Department for theft. According to the police report, Ashley Dover switched merchandise tags on products in order to purchase merchandise for significantly cheaper than what it's true value was. Ashley Dover's conduct and presence in Michigan is contrary to her release conditions, which restricted her travel to the Eastern District of Wisconsin and the Northern District of Illinois.

38. According to Wal-Mart loss prevention personnel, when prompted by Wal-Mart loss prevention personnel to identify herself, Ashley Dover, provided a credit card bearing another name. When asked to pronounce the name on the credit card, Ashley Dover said she could not, then provided her true name after further prompting from Wal-Mart loss prevention.

V. Ashley Dover's Internet Activity Since Her Release on Bond

39. On July 13, 2016, Milwaukee Police Department Detective, Stephanie Ramskugler, a former Task Force Officer with the Secret Service Milwaukee Financial Crimes Task Force, located Ashley Dover's Facebook page known as "ashley.t.dover," Facebook user ID, 1140720171, and Facebook moniker, "Ash AkaFree." Detective Ramskugler and I positively identified Ashley Dover from her Facebook profile picture. This photograph was posted to Facebook on May 27, 2016.

40. A further review of Ashley Dover's Facebook page shows she lists herself as an "Entrepreneur."

41. She has posted and shared eight photographs as her profile picture, posting these pictures to Facebook on January 12, 2015, four pictures on March 12, 2016, on April 30, 2016, on May 7, 2016, and on May 27, 2016.

42. A review of open posts and comments made by Ashley Dover since December 4, 2015, revealed 12 open source comments or posts. These comments or posts were made on January 13, 2016, March 24, 2016, March 25, 2016, April 3, 2016, May 2, 2016, May 4, 2016, May 5, 2016, May 21, 2016, June 3, 2016, July 6, 2016, and two comments on July 13, 2016.

43. The July 6, 2016 comment, "I'm a good photographer lmao [laughing my ass off]," by Ashley Dover was made on Facebook moniker, "RayRay PaperChasin" profile picture.

44. A review of "RayRay PaperChasin" revealed several Facebook profile pictures which I positively identified to be Olivia Ray, a co-defendant of Ashley Dover's from a 2012 credit card fraud/ID theft investigation in Mississippi where both were convicted of the fraud scheme. Ashley Dover also referred to Ray in her chat log as referenced in paragraph 10 of this affidavit.

45. On July 19, 2016, I appeared before Magistrate Judge William E. Duffin, Eastern District of Wisconsin, and obtained a search warrant for Ashley Dover's Facebook account. On August 30, 2016, I appeared before Magistrate Judge Nancy Joseph, Eastern District of Wisconsin, and obtained another search warrant for Ashley Dover's Facebook account.

46. On August 5, 2016, I received results from Facebook pursuant to the search warrant issued by Magistrate Judge William E. Duffin. The results covered a time period from December 4, 2016, to July 19, 2016. Ashley Dover first accessed the Facebook account on January 12, 2016. From January 12, 2016 to July 19, 2016, Ashley Dover accessed the internet through her Facebook account 4,078 times.

47. On September 26, 2016, I received results from Facebook pursuant to the search warrant issued by Magistrate Judge Nancy Joseph. The results covered a time period from July 19, 2016 to August 30, 2016. Ashley Dover continued to access her Facebook account on July 19, 2016, however the last known date she accessed the account was on August 23, 2016, the date of her bond review hearing for she did not appear. From July 19, 2016 to August 23, 2016, Ashley Dover accessed her Facebook account 391 times. Between August 24, 2016 and August 30, 2016, Ashley Dover did not access her Facebook account.

48. According to her Facebook account, Ashley Dover communicated with other persons about travel, MoneyGram and Western Union payments, and use to communicate further secretive messages through another online service. Specifically, Ashley Dover discussed travel to other states and renting vehicles. She also directed others to send and pick up payments for her. Ashley Dover and her friends sent each other Facebook messages containing internet links to private messages using "https://privnote.com," in which the messages self-destruct after being read.

VI. Ashley Dover's Relationship and Facebook Communication with Omeshia Crusoe

49. From April 16, 2016 to August 9, 2016, Ashley Dover communicated via Facebook messages with Omeshia Crusoe, Facebook moniker "Omeme Dearborn." Ashley Dover and "Omeme Dearborn" communicated over 500 messages to each other during this time period.

50. I identified Omeshia Crusoe from her Drug Enforcment Administration (DEA) arrest booking photo, taken June 21, 2011, compared to Facebook photographs of Ashley Dover and Crusoe. Omeshia Crusoe is from the Chicago, Illinois, which her last known address is from as well.

51. Omeshia Crusoe is on Ashley Dover's friend list. Omeshia Crusoe's Facebook user ID is 100011791564443 using Facebook moniker, "Omeme Dearborn."

52. The first message Ashley Dover sent to Omeshia Crusoe on April 16, 2016 stated, "I aint got no cash. My homie from ny sending me $200 can u pick it up and bring it to me. I'm starving in the MF [mother fucker]...aint got no cash". Omeshia Crusoe responded, "I can't do it my brother messed my name up with some jail shit. my lil cousins with me he will do it how much u gone pay him?" Ashley Dover responds, "Send me the name. My friend bout to send it"..."3118237250 is the mtcn Test question favorite color Answer Red Sender is: JOSEPH SYMOLON, State: New York". On August 4, 2016, Ashley Dover messaged Omeshia Crusoe, "My bad bf [best friend]. Yesterday was hectic AF [as fuck] by the time I got to the Walmart the part to send the money was closed . . . But the reference number is 710034800".

VII. Ashley Dover's Relationship and Facebook Communication with Courtney Nash

53. Ashley Dover and Courtney Nash served in jail together in Washington County, Mississippi in 2013.

54. From January 12, 2016 to August 23, 2016, Ashley Dover communicated via Facebook messages with Courtney Nash, Facebook moniker "Courtney Lynn." Ashley Dover and Courtney Nash communicated over 1,000 messages to each other during this time period.

55. Courtney Nash is on Ashley Dover's friend list. Courtney Nash's Facebook Facebook user ID is 1285740428 using Facebook moniker, "Courtney Lynn."

56. Ashley Dover directed Courtney Nash to send Ashley Dover cash. On June 11, 2016, Ashley Dover messaged Courtney Nash, "Yooo I need that bread [money] frfr [for real for real]. Can u moneygram??" Courtney Nash later responded with a photograph of a MoneyGram transaction, showing she sent $675.00 to Ashley Dover.

57. On August 17, 2016, Ashley Dover messaged Courtney, "Bond hearing on the 23rd. I'm going back to jail smh [shake my head]...My probation officer called me...N [and] she told me I had this hearing...I didn't even speak with the pretrial officer. So I guess I do get until Monday."

58. On August 21, 2016, Ashley Dover sent Courtney Nash a photograph with a large amount of US currency of at least $1,420. This cash was on the furniture in the basement of her father Jimmy Dover's residence, where Ashley Dover slept.

59. On August 23, 2016, the day that Dover failed to appear for her bond review hearing, Ashley Dover messaged Courtney Nash: "Call me back. They wanna give me 5 years."

VIII. Ashley Dover's Relationship and Facebook Communication with Portia Lamb

60. From April 23, 2016 to August 23, 2016, Ashley Dover communicated via Facebook messages with Portia Lamb, Facebook moniker "Portia Luckey." Ashley Dover and Portia Lamb communicated over 500 messages to each other during this time period.

61. Portia Lamb is on Ashley Dover's friend list. Portia Lamb's Facebook user ID is 1092586132 using Facebook moniker, "Portia Luckey."

62. I was able to review open source photographs of Portia Lamb's Facebook account. I identified Portia Lamb from her arrest booking photo provided by the Michigan State Police, taken March 3, 2016. Portia Lamb is from the Detroit, Michigan area, which her last known address is from as well.

63. Portia Lamb's criminal history involves arrests for theft, fleeing police, felony obstruction of judiciary, credit card fraud, and identity theft.

64. Ashley Dover and Portia Lamb messaged each other discussing traveling out of state, which, based on my training and experience, is common among persons who commit credit

card fraud. On June 20, 2016, Ashly Dover messaged Portia Lamb, "Yoo my car in ms [Mississippi]. Wud u go down there wit me to get it please please please"…"I almost feel like coming to Detroit tonight smh [shake my head]". On June 30, 2016, Ashley Dover messaged Portia Lamb, "U still in atl [Atlanta, Georgia]…I'm tryna come to the d [Detroit, Michigan]". On July 11, 2016, Ashley Dover messaged Portia Lamb, "…I need to come back your way..Imma try to come back this weekend weekend". On August 1, 2016, Ashley Dover messaged Portia Lamb, "Where u headed..I'm trying to hopefully leave tonight". Portia Lamb responded, "NJ [New Jersey]…I'm gone be gone before u get here".

65. Ashley Dover and Portia Lamb sent thirty https://privnote.com messages between each other which self-destruct after the messages are read.

66. On October 19, 2016, The United States Marshals interviewed Ashley Dover's ex-girlfriend, Judith Williams. Williams told them Ashley Dover was in the Detroit, Michigan area with someone nicknamed, "P." According to Facebook messages, Portia Lamb goes by the name of "P."

67. Around December 6, 2016, the United States Marshals interviewed Portia Lamb's brother, who confirmed she was with Ashley Dover.

IX. Ashley Dover's Preparation for Incarceration

68. From April 1, 2016 to August 23, 2016, Ashley Dover communicated via Facebook messages with "Jhene Lynn," who identify each other as cousins.

69. "Jhene Lynn" is on Ashley Dover's friend list. I located "Jhene Lynn's" Facebook page, Facebook user ID, 583182895, and Facebook moniker, "Jhene Lynne."

70. The first message Ashley Dover sent to "Jhene Lynn" on April 1, 2016 stated, "Don't hml [hit my line] about nothing on here g [gangster/friend]".

71. Ashley Dover and "Jhene Lynn" correspond using Facebook messages regarding Ashley Dover's plans if she is incarcerated again. On July 28, 2016, Ashley Dover messaged "Jhene Lynn," "I might need your help…If something goes bad…with this situation…I might has a list of things that I wud really need your help making sure things get put where they need to be…I wud ask o too but shed don't be responsible when it come to certain things". "Jhene Lynn" responds, "Okay cool…Just lmk [let me know]." Ashley Dover responds back, "Ok n I have your bread [money] too…I hope none of this is necessary but I gotta be prepared…It is VERY crazy and maybe she [US Probation] didn't call right away cuz I was already supposed to meet wit her [US Probation] on Thursday". "Jhene Lynn" responds, "Maybe but I think in a situation like that they probably will call you and ask you something or put a warrant out for your arrest". Ashley Dover responds, "I'm just gonna prepare myself just in case and see what happens end of story." Ashley Dover later provides her US Probation Officer's name and contact number and messages "Jhene Lynn," "I left my purse and my Lil bro jimmy room on his bookshelf. If they take me in I need u to get it. And keep it til I come back. It has a note for u from me in the inside of it..and also your money. Let o [Olivia Ray] know that there is a note for my dad on my brother jimmy bookshelf as well. Hopefully I'm ok. I'm heading out now smh [shake my head]". Ashley Dover later responds, "I'm good…She didn't even mention it".

72. Ashley Dover used Facebook as her main communication to communicate with persons. On July 29, 2016, Ashley Dover messages "Jhene Lynn," "Don't delet fb [Facebook]. This a main way I talk to u lol [laughing out loud]."

73. Ashley Dover also messaged "Jhene Lynn" two https://privnote.com messages that self-destruct after being read.

X. Ashley Dover's Failure to Appear

74. On August 11, 2016, Judge Charles N. Clevert ordered Ashley Dover to appear before him for a bond revocation hearing that was to occur on August 23, 2016. Her attorney, Patrick Brennan, was present, but Ashley Dover failed to appear. I attended the hearing.

75. Brennan told the court he met and spoke with Ashley Dover the previous day. Brennan also told the court that Ashley Dover told him that she would appear at the hearing. Judge Clevert ordered the arrest of Ashley Dover due to her failure to appear.

76. Pretrial Services contacted Ashley Dover's father, Jimmy Dover, who agreed to be Ashley Dover's Third Party Custodian, relating to her release pending trial or sentencing. Jimmy Dover claimed to be unaware of Ashley Dover's recent nefarious activities as well as the bond revocation hearing on August 23, 2016.

XI. Further Evidence of Fraud Obtained from Dover's Last Known Residence

77. On August 23, 2016, an arrest warrant was issued for Ashley Dover from the United States District Court, Eastern District of Wisconsin, for failing to appear for a bond revocation hearing on August 23, 2016.

78. On August 26, 2016, task force agents from the United States Secret Service and I attempted to locate Ashley Dover by going to her residence of record, 650 W. 87th St, Chicago, IL 60620. Lavinia Dover, stepmother of Ashley Dover, allowed agents to search 650 W. 87th St. Chicago, IL 60620, but Ashley Dover was not located. Of note, retail packaging of a suitcase was located in the room where Ashley Dover's belongings were, but the suitcase was not present. Immediate personal effects such as cell phone(s), driver's license, keys, wallet, etc were not located.

79. Lavinia Dover stated on August 3, 2016, she was removing Ashley Dover's trash from her room. In the trash bag she observed chicken wing bones and numerous ripped pieces of papers that caught her attention. The papers contained numbers and bank names, which in context with Ashley Dover's crimes made Lavinia Dover suspicious. Lavinia Dover did not believe the garbage belonged to anyone else residing in the residence because all other residents, except Ashley Dover, are "vegan." Lavinia Dover took photographs of the ripped papers, but threw them away because discarded food items were comingled with them. Upon recently hearing of Ashley Dover's recent transgressions, Lavinia Dover said that she wanted to be forthcoming with the Government.

80. I reviewed the photographs of 23 ripped papers provided by Lavinia Dover. Of note, there are personal calendar items relating to meeting with an unnamed attorney and Ashley Dover's original probation officer, Brian Kolbus, partial email address, "n_Kolbus@ilnpt.uscou." There's at least 69 different six digit bank identification numbers, (herein "BIN's"), which are the first six digits of a financial transaction card which represents what financial institution issued an account number. In addition to the 69 BIN's, many had a four digit number written next to them. Some of those had writings, of "worked," "hers," or "mine," next to them. There's at least two full credit card account number written, 4147202076236981 and 4147202178359681. A BIN look up of these numbers on the Secret Service eInformation website indicates they were issued by Chase Bank. There are also lists of retail stores that, from my training and experience, are frequently targeted merchants for credit card fraud and identity theft. Two email addresses were located: breezy5690@gmail and bcashbreeze@mail. The words "binary trading" and "forex" were written under a list of BIN's. A ripped paper contained the following: "Maria Gonzalez"…"My name is Jessica Bailey, I work

for DHS I'm calling for 2 reasons The 1st I havent received your time sheet & other reason is I wanted to make sure everything…"

XII. Evidence of Further Fraud from Email Account "bcashbreeze@mail.com"

81. On September 2, 2016, I appeared before Magistrate Judge William E. Duffin, Eastern District of Wisconsin, and obtained a search warrant for the email address of "bcashbreeze@mail.com" from 1&1 Mail & Media.

82. On September 9, 2016, I received results from 1&1 Mail & Media pursuant to the search warrant issued by Magistrate Judge William E. Duffin.

83. Located within the email account, "bcashbreeze@mail.com", was an email received on January 29, 2016 from "crimes.ws", titled, "Account validated at Crimes.WS :: Elite Carding Forum::!" The body contained information that the username, "bcashbreeze" account was activated and forums could be located at the given web address.

84. An internet search of "crimes.ws" revealed it is an underground hacker, carding forum to transact victims' account information. The website, "crimes.ws", originates from the country of Somoa, located in the Pacific Ocean.

XIII. Ashley Dover Alter-Ego, Facebook Moniker "Rudy Jenkins"

85. On August 26, 2016, I received pictures of letters located by Lavinia and Jimmy Dover that were signed by Ashley Dover. In the letters, Ashley Dover admitted, "Two weeks ago I violated my bond because I was arrested for retail fraud." She also wrote, "I'm supposed to have a bond hearing but I'm not going . . . I'd rather take my chances running." She also said, "I have to give myself a chance." The hand writing from these two letters appears similar to the writing of the ripped papers found in Ashley Dover's trash on August 3, 2016.

86. On September 23, 2016, I received a picture of a postcard mailed to Jimmy Dover from Ashley Dover, in which Dover referred to herself as "Rudy." Jimmy Dover said that received the postcard in the mail the day earlier. Ashley Dover writes, "Im so sorry about this. I hope you got my letter I left on Jays book-shelf for you + mom that explained where I was coming from with all this….I love you Dad and think of you everyday as well as my mom…Just letting you know Im doing alright. There's no need to worry. Love always, Rudy."

87. On November 15, 2016, I appeared before Magistrate Judge Nancy Joseph, Eastern District of Wisconsin, and obtained a search warrant for eight Facebook accounts for persons closely associated with Ashley Dover.

88. On November 30, 2016, I received results from Facebook pursuant to the search warrants, revealing Facebook records from January 12, 2016 to November 15, 2016.

89. On September 2, 2016, Ashley Dover received a Facebook message from her Facebook friend, "Portia Luckey" stating, "call me". No other messages were sent or received between Portia Lamb and Ashley Dover.

90. On September 5, 2016, Facebook moniker, "Rudy Jenkins" sent Portia Lamb, of Detroit, Michigan, a Facebook friend request.

91. Between September 5, 2016 and September 7, 2016, forty-six Facebook messages were exchanged between "Rudy Jenkins" and Portia Lamb. Of these, twenty-three of these messages were deleted by Portia Lamb. Of the forty-six Facebook messages, twelve of them contained https://privnote.com messages which self-destruct after the messages are read.

92. I located "Rudy Jenkins's" Facebook page, **Facebook user ID 100012981973745**. A review of Facebook account "Rudy Jenkins," shows the earliest activity occurring in August 2016, which is believed to be the month the account was created.

93. On August 3, 2016, at 17:38 UTC, Facebook moniker, "Rudy Jenkins" sent Ashley Dover a Facebook friend request.

94. On August 3, 2016, at 19:44 UTC, Facebook moniker, "Rudy Jenkins" sent Omeshia Crusoe, of Chicago, Illinois, a Facebook friend request.

95. On September 30, 2016, Facebook moniker, "Rudy Jenkins" sent Courtney Nash, of Jackson, Mississippi, a Facebook friend request.

96. Ashley Dover and "Rudy Jenkins" have Facebook friends in-common of Portia Lamb, of Detroit, Michigan, Omeshia Crusoe, of Chicago, Illinois, and Courtney Nash, of Jackson, Mississippi. However, Portia Lamb, Omeshia Crusoe, and Courtney Nash are not Facebook friends with one another, and their only known links are Ashley Dover and "Rudy Jenkins."

97. Ashley Dover and "Rudy Jenkins" also belong to the same Facebook Groups; "Baddest Lesbians," "About DAT Lifestyle ENT," and "LGBT'S COLOR OF LUV."

98. "Rudy Jenkins" Facebook account is also friends with international persons from countries such as Algeria, Kenya, Cote d'Ivoire, Spain, United Kingdom and persons whose names are written in Arabic but don't identify where their home country is. It is known in this investigation that Ashley Dover associates with persons from all over the world.

XIV. Arrest of Ashley Dover

99. On December 10, 2016, Ashley Dover was arrested in Palm Beach County, Florida. According to the police report of the arrest, Dover possessed 17 fraudulent driver's licenses and 15 fraudulent credit cards on Dover's person. The person with whom she was arrested referred to Dover as the "kingpin" of their fraud.

XV. Facebook Characteristics and Features

100. Facebook owns and operates a free-access social networking website of the same name that can be accessed on the internet at http://www.facebook.com. Facebook allows its users to establish accounts with Facebook, and users can then use their accounts to share written news, photographs, videos, and other information with other Facebook users, and sometimes with the general public.

101. Facebook asks users to provide basic contact and personal identifying information to Facebook, either during the registration process or thereafter. This information may include the user's full name, birth date, gender, contact e-mail addresses, Facebook passwords, Facebook security questions and answers (for password retrieval), physical address (including city, state, and zip code), telephone numbers, screen names, websites, and other personal identifiers. Facebook also assigns a user identification number to each account.

102. Facebook users may join one or more groups or networks to connect and interact with other users who are members of the same group or network. Facebook assigns a group identification number to each group. A Facebook user can also connect directly with individual Facebook users by sending each user a "Friend Request." If the recipient of a "Friend Request" accepts the request, then the two users will become "Friends" for purposes of Facebook and can exchange communications or view information about each other. Each Facebook user's account includes a list of that user's "Friends" and a "News Feed," which highlights information about the user's "Friends," such as profile changes, upcoming events, and birthdays.

103. Facebook users can select different levels of privacy for the communications and information associated with their Facebook accounts. By adjusting these privacy settings, a Facebook user can make information available only to himself or herself, to particular Facebook

users, or to anyone with access to the Internet, including people who are not Facebook users. A Facebook user can also create "lists" of Facebook friends to facilitate the application of these privacy settings. Facebook accounts also include other account settings that users can adjust to control, for example, the types of notifications they receive from Facebook.

104. Facebook users can create profiles that include photographs, lists of personal interests, and other information. Facebook users can also post "status" updates about their whereabouts and actions, as well as links to videos, photographs, articles, and other items available elsewhere on the Internet. Facebook users can also post information about upcoming "events," such as social occasions, by listing the event's time, location, host, and guest list. In addition, Facebook users can "check in" to particular locations or add their geographic locations to their Facebook posts, thereby revealing their geographic locations at particular dates and times. A particular user's profile page also includes a "Wall," which is a space where the user and his or her "Friends" can post messages, attachments, and links that will typically be visible to anyone who can view the user's profile.

105. Facebook has a Photos application, where users can upload an unlimited number of albums and photos. Another feature of the Photos application is the ability to "tag" (i.e., label) other Facebook users in a photo or video. When a user is tagged in a photo or video, he or she receives a notification of the tag and a link to see the photo or video. For Facebook's purposes, the photos associated with a user's account will include all photos uploaded by that user that have not been deleted, as well as all photos uploaded by any user that have that user tagged in them.

106. Facebook users can exchange private messages on Facebook with other users. These messages, which are similar to e-mail messages, are sent to the recipient's "Inbox" on

Facebook, which also stores copies of messages sent by the recipient, as well as other information. Facebook users can also post comments on the Facebook profiles of other users or on their own profiles; such comments are typically associated with a specific posting or item on the profile. In addition, Facebook has a Chat feature that allows users to send and receive instant messages through Facebook. These chat communications are stored in the chat history for the account. Facebook also has a Video Calling feature, and although Facebook does not record the calls themselves, it does keep records of the date of each call.

107. If a Facebook user does not want to interact with another user on Facebook, the first user can "block" the second user from seeing his or her account.

108. Facebook has a "like" feature that allows users to give positive feedback or connect to particular pages. Facebook users can "like" Facebook posts or updates, as well as webpages or content on third-party (i.e., non-Facebook) websites. Facebook users can also become "fans" of particular Facebook pages.

109. Facebook has a search function that enables its users to search Facebook for keywords, usernames, or pages, among other things.

110. Each Facebook account has an activity log, which is a list of the user's posts and other Facebook activities from the inception of the account to the present. The activity log includes stories and photos that the user has been tagged in, as well as connections made through the account, such as "liking" a Facebook page or adding someone as a friend. The activity log is visible to the user but cannot be viewed by people who visit the user's Facebook page.

111. Facebook Notes is a blogging feature available to Facebook users, and it enables users to write and post notes or personal web logs ("blogs"), or to import their blogs from other services, such as Xanga, LiveJournal, and Blogger.

112. The Facebook Gifts feature allows users to send virtual "gifts" to their friends that appear as icons on the recipient's profile page. Gifts cost money to purchase, and a personalized message can be attached to each gift. Facebook users can also send each other "pokes," which are free and simply result in a notification to the recipient that he or she has been "poked" by the sender.

113. Facebook also has a Marketplace feature, which allows users to post free classified ads. Users can post items for sale, housing, jobs, and other items on the Marketplace.

114. In addition to the applications described above, Facebook also provides its users with access to thousands of other applications on the Facebook platform. When a Facebook user accesses or uses one of these applications, an update about that the user's access or use of that application may appear on the user's profile page.

115. Facebook uses the term "Neoprint" to describe an expanded view of a given user profile. The "Neoprint" for a given user can include the following information from the user's profile: profile contact information; News Feed information; status updates; links to videos, photographs, articles, and other items; Notes; Wall postings; friend lists, including the friends' Facebook user identification numbers; groups and networks of which the user is a member, including the groups' Facebook group identification numbers; future and past event postings; rejected "Friend" requests; comments; gifts; pokes; tags; and information about the user's access and use of Facebook applications.

116. Facebook also retains Internet Protocol ("IP") logs for a given user ID or IP address. These logs may contain information about the actions taken by the user ID or IP address on Facebook, including information about the type of action, the date and time of the action, and the user ID and IP address associated with the action. For example, if a user views a

Facebook profile, that user's IP log would reflect the fact that the user viewed the profile, and would show when and from what IP address the user did so.

117. Social networking providers like Facebook typically retain additional information about their users' accounts, such as information about the length of service (including start date), the types of service utilized, and the means and source of any payments associated with the service (including any credit card or bank account number). In some cases, Facebook users may communicate directly with Facebook about issues relating to their accounts, such as technical problems, billing inquiries, or complaints from other users. Social networking providers like Facebook typically retain records about such communications, including records of contacts between the user and the provider's support services, as well as records of any actions taken by the provider or user as a result of the communications.

118. Therefore, the computers of Facebook are likely to contain all the material described above, including stored electronic communications and information concerning subscribers and their use of Facebook, such as account access information, transaction information, and other account information.

INFORMATION TO BE SEARCHED AND THINGS TO BE SEIZED

119. I anticipate executing this warrant under the Electronic Communications Privacy Act, in particular 18 U.S.C. §§ 2703(a), 2703(b)(1)(A) and 2703(c)(1)(A), by using the warrant to require Facebook to disclose to the government copies of the records and other information (including the content of communications) particularly described in Section I of Attachment B. Upon receipt of the information described in Section I of Attachment B, government-authorized persons will review that information to locate the items described in Section II of Attachment B.

CONCLUSION

120. Based on the forgoing, I request that the Court issue the proposed search warrants.

121. This Court has jurisdiction to issue the requested warrant because it is "a court of competent jurisdiction" as defined by 18 U.S.C. § 2711. 18 U.S.C. §§ 2703(a), (b)(1)(A) & (c)(1)(A). Specifically, the Court is "a district court of the United States . . . that – has jurisdiction over the offense being investigated." 18 U.S.C. § 2711(3)(A)(i).

122. Pursuant to 18 U.S.C. § 2703(g), the presence of a law enforcement officer is not required for the service or execution of this warrant.

ATTACHMENT A

Property to Be Searched

This warrant applies to information associated with the **Facebook user ID 100012981973745** that is stored at premises owned, maintained, controlled, or operated by Facebook, a company headquartered in Menlo Park, California.

ATTACHMENT B

Particular Things to be Seized

I. Information to be disclosed by Facebook

To the extent that the information described in Attachment A is within the possession, custody, or control of Facebook, including any messages, records, files, logs, or information that have been deleted but are still available to Facebook, or have been preserved pursuant to a request made under 18 U.S.C. § 2703(f), Facebook is required to disclose the following information to the government for user ID listed in Attachment A from August 1, 2016 to the present:

a. All contact and personal identifying information, including full name, user identification number, birth date, gender, contact e-mail addresses, Facebook passwords, Facebook security questions and answers, physical address (including city, state, and zip code), telephone numbers, screen names, websites, and other personal identifiers.

b. All IP logs between August 1, 2016 to the present;

c. All activity logs for the account and all other documents showing the user's posts and other Facebook activities;

d. All photos uploaded by that user ID and all photos uploaded by any user that have that user tagged in them;

e. All profile information; News Feed information; status updates; links to videos, photographs, articles, and other items; Notes; Wall postings; friend lists, including the friends' Facebook user identification numbers; groups and networks of which the user is a member, including the groups' Facebook group identification numbers; future and past event postings; rejected "Friend" requests; comments;

gifts; pokes; tags; and information about the user's access and use of Facebook applications;

f. All other records of communications and messages made or received by the user, including all private messages, chat history, video calling history, and pending "Friend" requests;

g. All "check ins" and other location information;

h. All IP logs, including all records of the IP addresses that logged into the account;

i. All records of the account's usage of the "Like" feature, including all Facebook posts and all non-Facebook webpages and content that the user has "liked";

j. All information about the Facebook pages that the account is or was a "fan" of;

k. All past and present lists of friends created by the account;

l. All records of Facebook searches performed by the account;

m. All information about the user's access and use of Facebook Marketplace;

n. The types of service utilized by the user;

o. The length of service (including start date) and the means and source of any payments associated with the service (including any credit card or bank account number);

p. All privacy settings and other account settings, including privacy settings for individual Facebook posts and activities, and all records showing which Facebook users have been blocked by the account;

q. All records pertaining to communications between Facebook and any person regarding the user or the user's Facebook account, including contacts with support services and records of actions taken.

II. Information to be seized by the government

All information described above in Section I that constitutes fruits, evidence and instrumentalities of violations of in violation of 18 U.S.C. § 401(3), failure to appear to a court ordered hearing, in violation of 18 U.S.C. § 3146, wire fraud, in violation of 18 U.S.C. § 1343, and access device fraud, in violation of 18 U.S.C. § 1029 involving Ashley Dover since January 12, 2016, including, for the user ID identified on Attachment A, information pertaining to the following matters:

(a) Any information relating to the use of internet through the Facebook user ID.

(b) Records relating to who created, used, or communicated with the user ID, including records about their identities and whereabouts.